



# Montana WIC Program

## Local Agency Monitoring Process

Federal Fiscal Years 2017-2018

*USDA requires the Montana WIC Program to monitor local WIC agencies for program compliance; Montana WIC monitors approximately half of the local WIC agencies annually. State Office staff review numerous program activities through remote reviews of WIC participant charts and other documents, as well as on-site observations of WIC services, and provides an overall monitoring score to each agency. Monitoring scores determine if an agency falls in Tiers 1, 2, or 3; each Tier requires different follow-up activities. This document highlights each major part of the WIC local agency monitoring process.*

### **Section 1: Preparing for the monitoring visit.**

**Scheduling:** State Office staff develops an annual local agency monitoring schedule by coordinating with each selected agency to schedule a date and time for the visit that is agreeable to both parties.

**Official Notification:** The local agency will be notified of the official monitoring date and time with a letter sent certified mail 60 days prior. The letter is sent to the contract signer, the WIC Director, and one is filed in the local agency's chart at the state office.

**Financial Review:** The letter will identify which two months of expenditure reports will be reviewed and require supporting documentation to be submitted 30 days prior to visit date. The copies of the selected reports will be included with the letter and the local agency fiscal personnel or Director, will be responsible to copy and send this documentation in.

There will also be a WIC Financial Questionnaire included for completion which will also be due to the WIC State office 30 days prior to visit. Any areas of concern related to the Questionnaire may be documented on the Pre-Monitoring Worksheet.

**Pre-Monitoring Worksheet:** The State WIC Office monitoring team completes an internal pre-monitoring worksheet in order to review local agency program areas that cannot be evaluated in the chart review or on-site during observation. This worksheet includes a review of the following:

- Contract/Fiscal Compliance
- Complaints
- Time study
- Quarterly integrity audits
- Civil Rights
- Nutrition
- Breastfeeding
- Information technology
- Review of the previous monitoring, self-monitoring process, and Corrective Action Plan

For each of the areas identified in the Pre-Monitoring worksheet, State Office staff will determine if a finding is warranted (require corrective action) or if it is a discussion item based on severity of the issues and if trends are identified.

**WIC participant chart reviews:** State WIC staff will review WIC participant charts for compliance. The size of the agency, based on participation, will determine how many charts to review.

- Small Clinics (0-400 Participants): 8 Charts Reviewed
- Medium Clinics (401-1000 Participants): 16 Charts Reviewed
- Large Clinics (1001-2000 Participants): 32 Charts Reviewed
- Extra Large Clinics (>2000 Participants): 40 Charts Reviewed

All findings identified as part of the chart review are factored into the monitoring score.

*Nutrition findings* areas include: risk code assignment, participant referral and follow up, food package assignment/issuance/tailoring, documentation of breastfeeding and/or nutrition education, anthropometric/hematological measures and follow up, goal established and follow up, nutrition assessment questions, and the nutrition care plan.

*Administrative findings* areas include: participant identification documentation, authorized representative ID documentation, served within the required timeframe, income eligibility/adjunctive eligibility verification, end of certification/ineligibility notices, confidentiality/integrity, residency documentation, and verification of certification (VOC) process.

The monitoring team will review the same charts for consistency and accuracy in the chart review process. Charts to be reviewed will be obtained from a random data pull and will be selected based on the following criteria:

- Verified to have been certified and served within relevant local agency
- Include at least 2 visits, preferably more (i.e. certification, follow up and mid-certification)
- Include all WIC participant categories
- At least one high-risk chart based on nutrition risk criteria and/or food package III designation

Note: The review period may include any timeframe since the last monitoring evaluation.

## **Section 2: Conducting the on-site monitoring visit**

**On-site Visit:** When the monitoring team visits the local agency they will bring the draft monitoring report, the draft scoring sheet, the pre-monitoring worksheet, the computer inventory sheet, and any needed miscellaneous items. At least 20% of clinics will need to be observed on-site, if a local agency has more than 5 clinics the monitoring team will plan to visit at least 2 clinics.

**Entrance Interview:** The on-site visit will begin with an entrance interview, introducing the staff and reviewing the monitoring process on-site.

**Observation:** The monitoring team will observe appointments and review the items listed on the Clinic Observation Form. All observation items may be included in the final monitoring report and require corrective action if deemed necessary, however, not all items affect the monitoring score. Details related to how these areas are reviewed is located in the Clinic Observation Findings Form.

**Participant Appointment (scored):**

- Certification Procedures
- Served within Timeframe
- Voter Registration Procedures
- Anthropometrics
- Bloodwork
- Food Package
- Required Education
- Rights & Responsibilities

**Observation- Clinic Operations (scored):**

- Training
- Nutrition Education Materials
- Breastfeeding
- Pump Program
- Civil Rights
- Outreach Plans
- Benefit Management
- Posters/Signage

**Observation- Overall Clinic (not scored):**

- Clinic Environment
- Employee Integrity
- Separation of Duties
- IEG Available/Posted
- No-Show Policy
- Appointment Scheduling
- Clinic Signage
- Review Self-Monitoring
- VENA

**Exit Interview:** At the conclusion of the monitoring visit, State staff will conduct an exit interview recapping the preliminary findings from the monitoring evaluation. Final score and findings will not be known at this time. All pertinent WIC staff should plan on attending both the entrance interview as well as the exit interview.

## **Section 3: State Follow-up Procedures**

**Scoring:** A sample score sheet may be obtained by contacting the State office.

The score is calculated based on the entry of findings into an excel spreadsheet with calculations reflecting equal weight for all chart review findings, totaling 80% of that section of the scoring. Then 20% is weighed for observations on-site. An additional factor consists of the number of charts with findings and how many finding areas are affected by the review.

**Final Monitoring Report:** After the onsite visit, the State monitoring team will return to the office to finalize the monitoring process. Within 30 days, a final monitoring report will be sent to the local agency detailing all of the findings, the final score, the agency's Tier assignment (1-3) and required follow-up activities.

## **Section 4: Local Agency Next Steps**

When the Local agency receives the final monitoring report, they will review the areas they had findings in and their final score.

**Corrective Action Plan (CAP):** a Corrective Action Plan (CAP) addressing the finding areas identified in their monitoring report within 30 days of receipt. A CAP for a finding area may be waived if the number of findings do not impact the score (within forgiveness factor), this will be clearly indicated. A letter will be sent to the Local Agency indicating acceptance or denial of the CAP within 30 days of receipt. Documentation of completed activities should be maintained on file.

The CAP is developed by the local agency and should incorporate specific activities to address each finding area. Examples of activities may include: review of State Plan policies, review of M-SPIRIT modules, attending New Employee Training, or coming up with references and resources for staff to refer to in order to avoid deficiencies going forward.

**Tier 1 Follow-up (≥80%):** Tier 1 is the highest score and indicates the local agency is generally operating in accordance with federal regulation, State policy and the terms of their contract.

Self-monitoring is required to be completed at the local level using State forms and processes the following year. Results of this monitoring will be reviewed at the next State monitoring visit.

### **Tier 2 Follow-up (65-79%):**

Self-chart reviews are required on 8 charts at 6, 9 and 12 months after the monitoring report is received. When the last self-chart review is completed the monitoring team will write up a final self-chart review letter that will be sent certified mail to the contract signer, WIC Director, and one is filed in the local agency chart at the state office. If, after the 12 month self-chart review

there is no significant improvement, a meeting will be set up with the monitoring team and pertinent local agency staff to discuss program integrity and performance standards.

**Tier 3 Follow-up (<65%):** Tier 3 is the lowest score and indicates program integrity issues

Self-chart reviews are required on 8 charts for 2 quarters; at 6 and 9 months. The first chart is due approximately 6 months after receipt of the monitoring report. When the last self-chart review is completed the monitoring team will write a final self-chart review letter that will be sent certified mail to the contract signer, WIC Director, and one is filed in the local agency chart at the State office. In addition, for Tier 3 agencies, verification of the Corrective Action Plan completion must be sent to the state office within 60 days of completion.

The state office will complete another full monitoring of the local agency the following year. The agency will remain on its original cycle; therefore Tier 3 agencies will be monitored 3 years in a row by the State office.

## **Section 5: Conclusion & Forms List**

**Conclusion:** The intent of this document is to summarize the monitoring process. For a more detailed description of the monitoring process, refer to the following associated forms which are attachments in the State Plan:

- Pre-Monitoring Form
- WIC Financial Questionnaire
- Administrative Chart Review Form
- Administrative Findings Form
- Nutrition Chart Review Form
- Nutrition Findings Form
- Clinic Observation Form
- Observation Findings Form
- Scoring Form (sample), available by request from the State Office